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VOLUME: I
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EXHIBITS: 5-15

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
CIVIL ACTION NO. 4:21-CV-10572-TSH

KPM ANALYTICS NORTH AMERICA CORPORATION,)
Plaintiff,)
vs.)
BLUE SUN SCIENTIFIC, LLC, THE INNOVATIVE)
TECHNOLOGIES GROUP & CO., LTD., ARNOLD)
EILERT, MICHELLE GAJEWSKI, ROBERT)
GAJEWSKI, RACHAEL GLENISTER, GREGORY)
ISRAELSON, IRVIN LUCAS, AND PHILIP OSSOWSKI,)
Defendants.)

REMOTE VIDEOTAPED DEPOSITION OF
INNOVATIVE TECHNOLOGIES GROUP & CO., LTD, BY ROBERT
R. WILT, called as a witness by and on behalf of
the Plaintiff, pursuant to the applicable
provisions of the Federal Rules of Civil Procedure,
Rule 30(b)(6), before P. Jodi Ohnemus (remotely),
RPR, RMR, CRR, NH-LSR #91, MA-CSR #123193 and
CA-CSR #13192, at Jessup, Maryland, on Thursday,
July 8, 2021, commencing at 10:10 a.m. (EDT).

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1 Innovative Technologies Group & Company.

2 Q. And if I refer to the Innovative
3 Technologies Group Company as "ITGC," would that be
4 acceptable?

5 A. Yes.

6 Q. You'll understand what I'm talking about;
7 right?

8 A. Of course.

9 Q. And what is your role with ITGC?

10 A. President and CEO.

11 Q. Okay. Do you have any role with Blue Sun
12 Scientific?

13 A. I'd be the manager from the LLC side.
14 Other than that, no.

15 Q. And what are your current responsibilities
16 with ITGC?

17 A. Chief cook and bottle washer.

18 Basically, I am president of ITGC. I'm
19 also a very strong engineer. So I do a lot of
20 engineering. I help with production. We're a
21 small company. So we do a lot of things. We've
22 been doing it for years. So I help to prepare
23 financials. I do everything that a president would
24 normally do. Sometimes people say not so well, but
25 yeah.

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1 So I manage the group as well.

2 Q. You said it's a relatively small company.
3 How many employees does ITGC have?

4 A. Usually around six full time. We compress
5 and expand depending on needs. But we have about
6 six full-time and maybe four part-time.

7 Q. Okay. And those full-time employees,
8 what's the nature of their work?

9 A. Well, you're going to have to -- you're
10 going to need accounting. You're going to need
11 purchasing and procurement; and remember we're a
12 manufacturing company. So we have all the
13 manufacturing functions. And, then, you're going
14 to need -- the rest of us are pretty much engineers
15 and technicians.

16 We have our own machine shop so we can do
17 our own machining. So we have people that can
18 machine as well as people who can develop, design,
19 manufacture things.

20 Q. Where are ITGC's offices located?

21 A. We're in Jessup, Maryland, technically.
22 8017 Dorsey Run Road.

23 Q. Okay. And is that where the machine shop
24 is as well?

25 A. That's correct. We have about 7,000

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1 square feet, and so you could -- if you came here,
2 you'd see a bunch of technical geekie people
3 running around.

4 Q. How long have you been with ITGC?

5 A. Since 1997.

6 Q. Okay. Were you one of the founders of
7 ITGC?

8 A. I was.

9 Q. Okay. Were there any other founders of
10 ITGC?

11 A. There was. George Toth and Patrick Wilt.

12 Q. And are -- is Mr. Toth still with ITGC?

13 A. He is not.

14 Q. Is Patrick Wilt still with ITGC?

15 A. He is deceased.

16 Q. Sorry to hear that.

17 A. Well, thank you. Appreciate it.

18 Q. When did George Toth leave ITGC?

19 A. When we sold our share in Blue Sun
20 Scientific, back in 2008.

21 Q. What do you mean when you say when you
22 sold your share in Blue Sun Scientific?

23 A. We were the founders of Blue Sun
24 Scientific.

25 Q. Okay.

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1 A. And we owned a third -- a third of them
2 and we sold them off to a company called Westco
3 Scientific, that then sold it off to your group --
4 or -- sorry -- KPM.

5 Q. Are you referring to Blue Sun Scientific
6 or unit -- Unity Scientific?

7 A. Sorry, Unity Scientific. Thanks for
8 correcting me. Appreciate it.

9 Q. Okay. Just so the record's clear, Mr.
10 Toth left ITGC when it sold Unity Scientific in --
11 in or about 2008; is that right?

12 A. Say that again.

13 Q. Okay.

14 A. I didn't hear part of that.

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Q. And do you have any ownership interest
directly or indirectly in Blue Sun Scientific?

A. No. Innovative Technologies owns Blue Sun
Scientific as a -- started as an LLC. It is the --

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1 currently the only member.

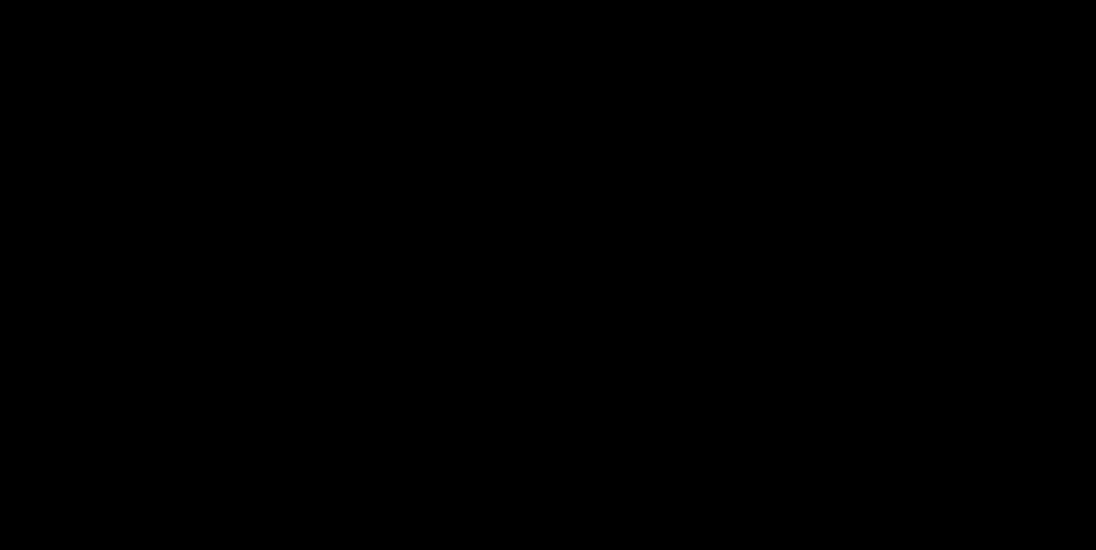
2 Q. Okay. Has Blue Sun Scientific ever had
3 any members -- Blue Sun Scientific LLC had any
4 members other than ITGC?

5 A. No.

6 Q. Okay. Has Blue Sun Scientific LLC ever
7 had any managers other than you?

8 A. No.

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18 A. No. Secretary would be Cathy.

19 Q. What's Cathy's last name?

20 A. Wilt.

21 Q. Is she related to you?

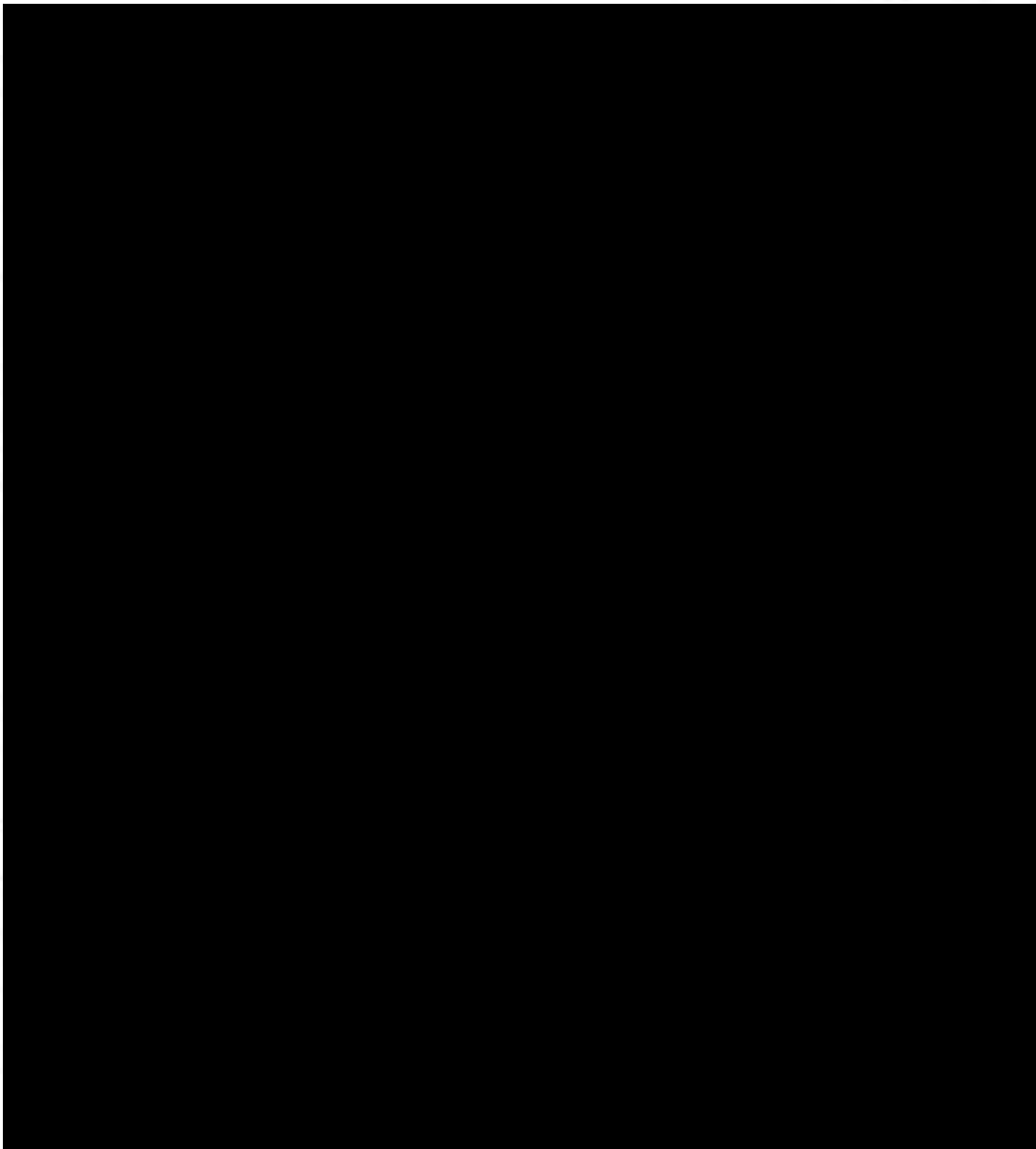
22 A. She is. She's my wife. Thankfully. She
23 puts up with me.

24 Q. Okay. So when ITGC was originally formed,
25 what was the business of ITGC?

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Q. Has the business of ITGC changed over time since its founding?

A. You'd have to -- you have to -- you have to clarify that question. I don't know what you mean by that.

Q. Okay. Well, you said at its founding it

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1 Q. Currently does ITGC manufacture NIR
2 spectroscopy analyzers?

3 A. Yes.

4 Q. Yes.

5 A. Sure.

6 Q. And when did ITGC start manufacturing such
7 analyzers?

8 A. We started manufacturing those in 2001.
9 We started -- remember, we manufactured analyzers
10 for Unity Scientific -- well, we -- we created
11 Unity Scientific. So we -- remember, we took that
12 concept and we created an OEM and got an investor,
13 and we put it all together so that ITGC was
14 providing the technology to a sales initiative
15 group; and so we produced that technology for them.

16 And then, when we sold the company, we did
17 other things for a while, and then we started
18 another initiative making spectrometers.

19 Q. So between the time -- well, strike that.

20 When you sold Unity Scientific in or about
21 2008, at that point did you stop manufacturing
22 spectrometers for a time?

23 A. Yes, we did.

24 Q. Okay. And --

25 A. We had to. That was the condition. You

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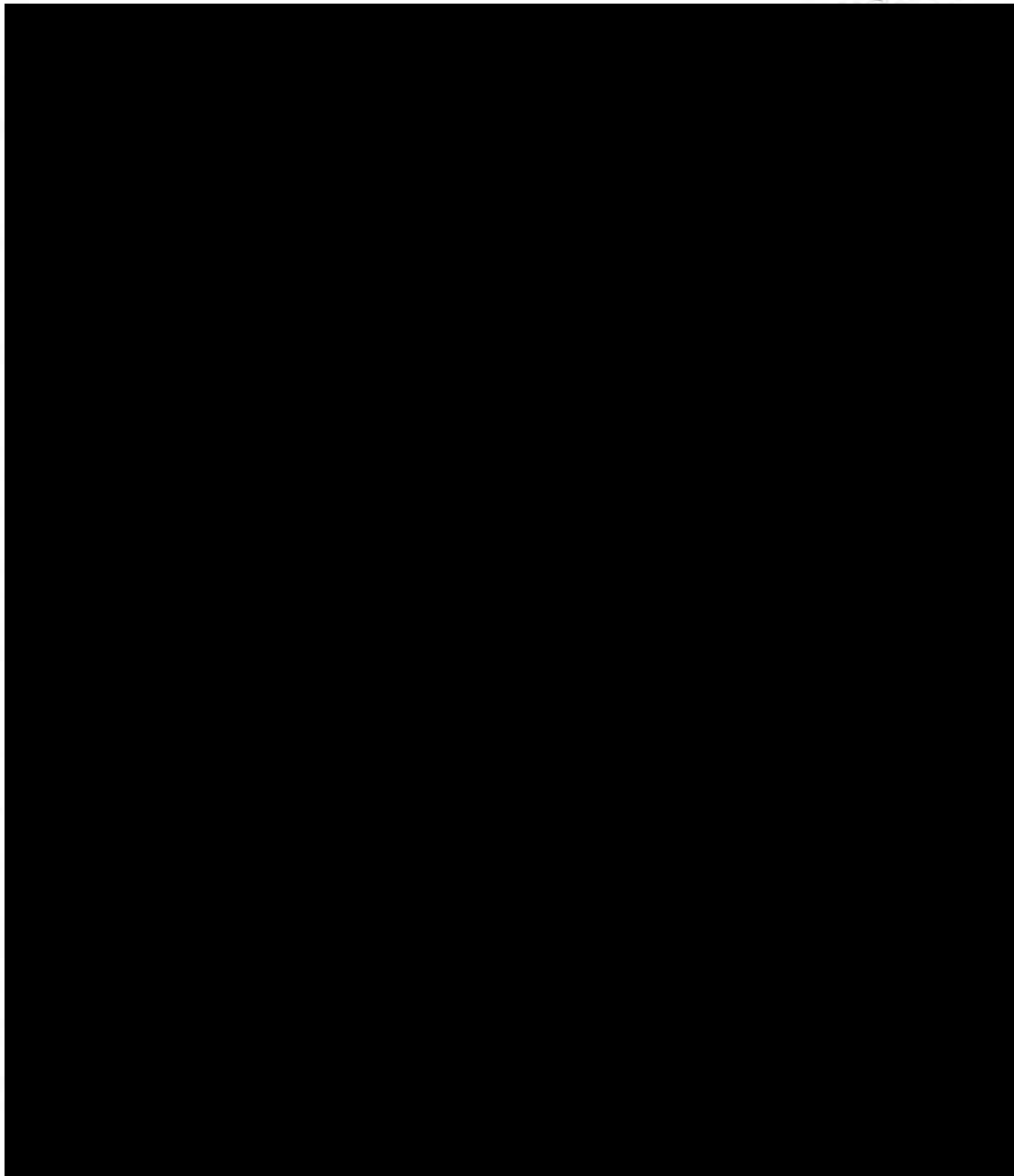
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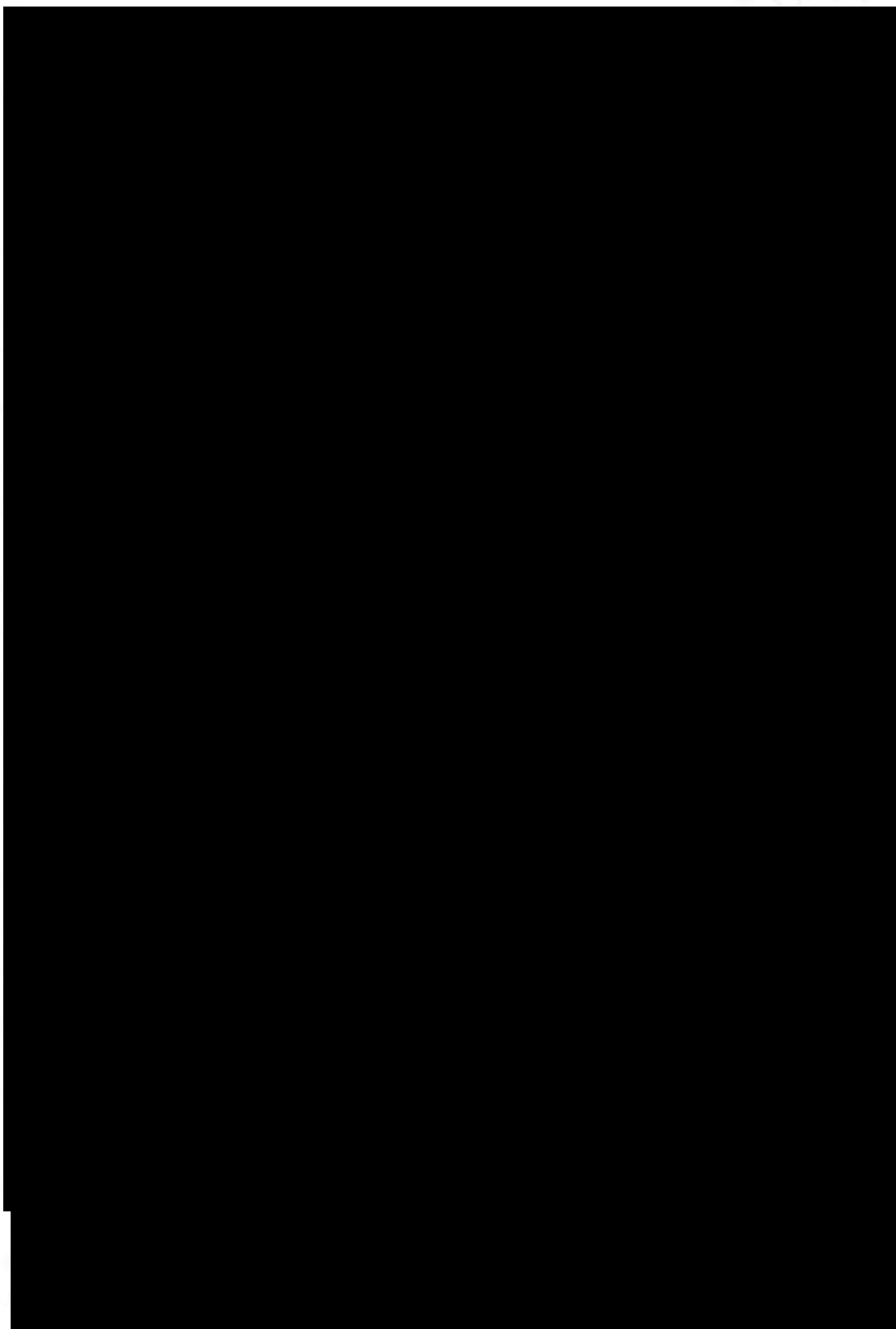
Q. All right. Do ITGC and Blue Sun Scientific have any common employees?

A. Common? Not really. We have a -- no, not necessarily. We have -- there's a guy named John Schank who is a tacit consultant that they've used

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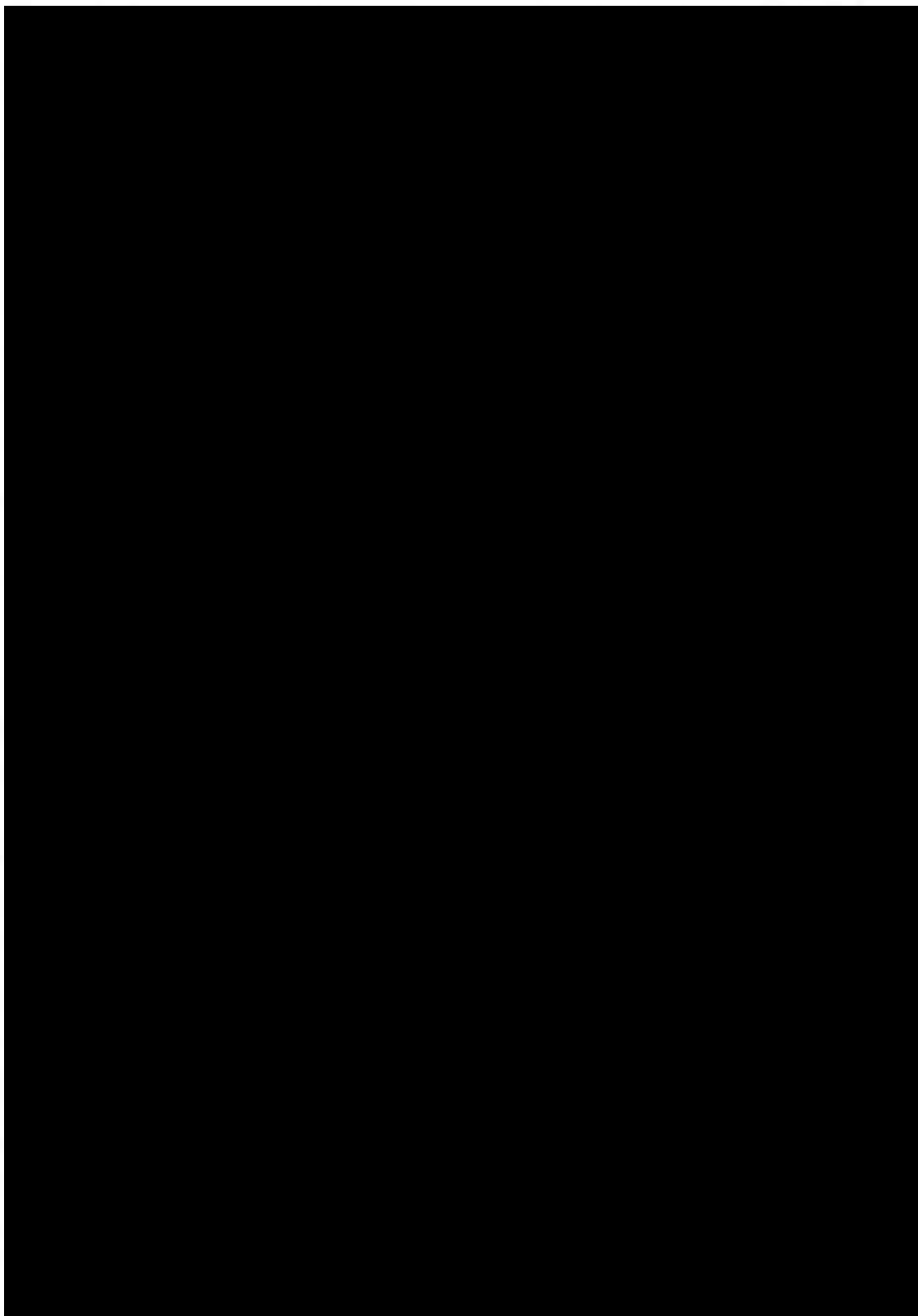
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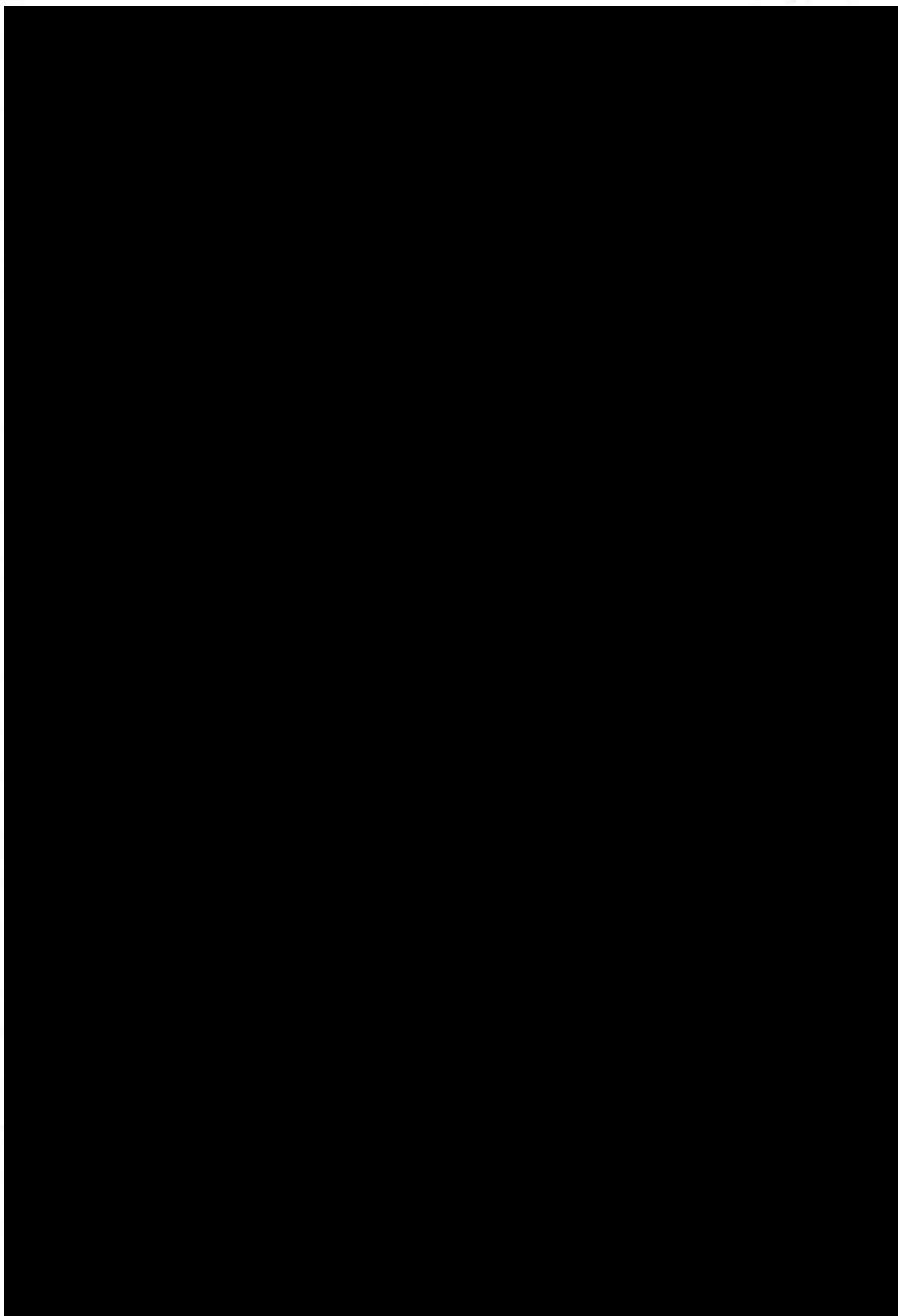
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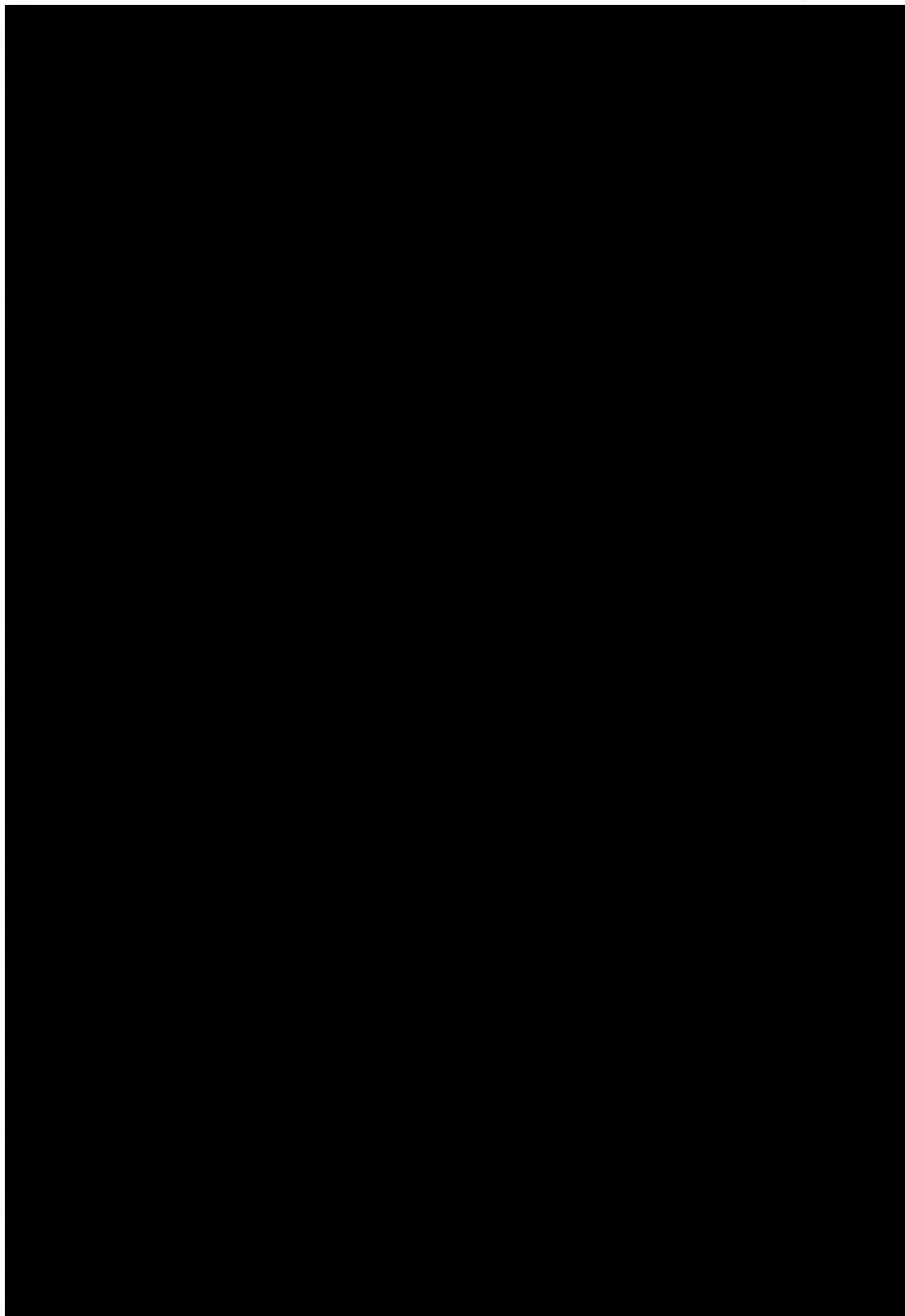
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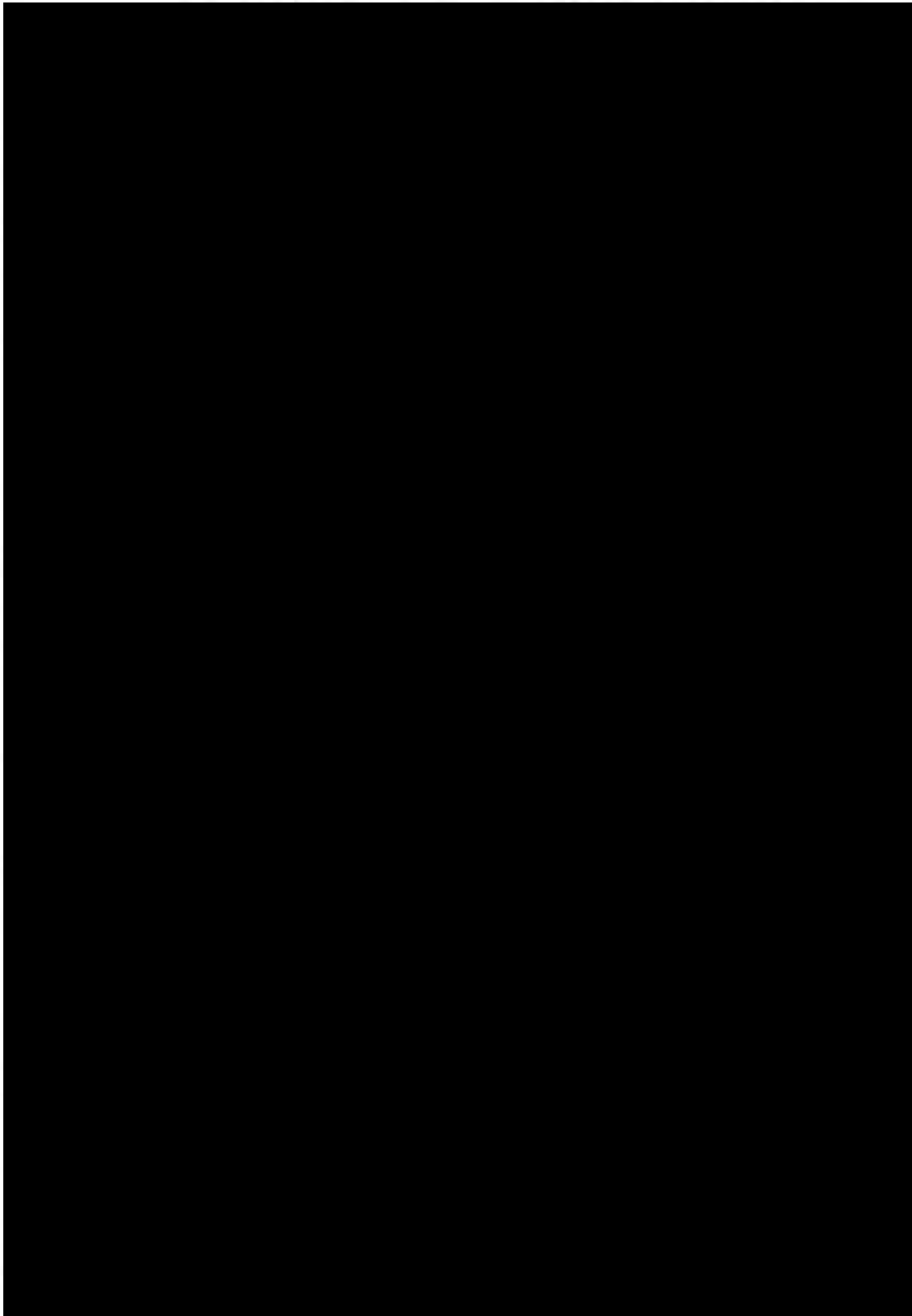
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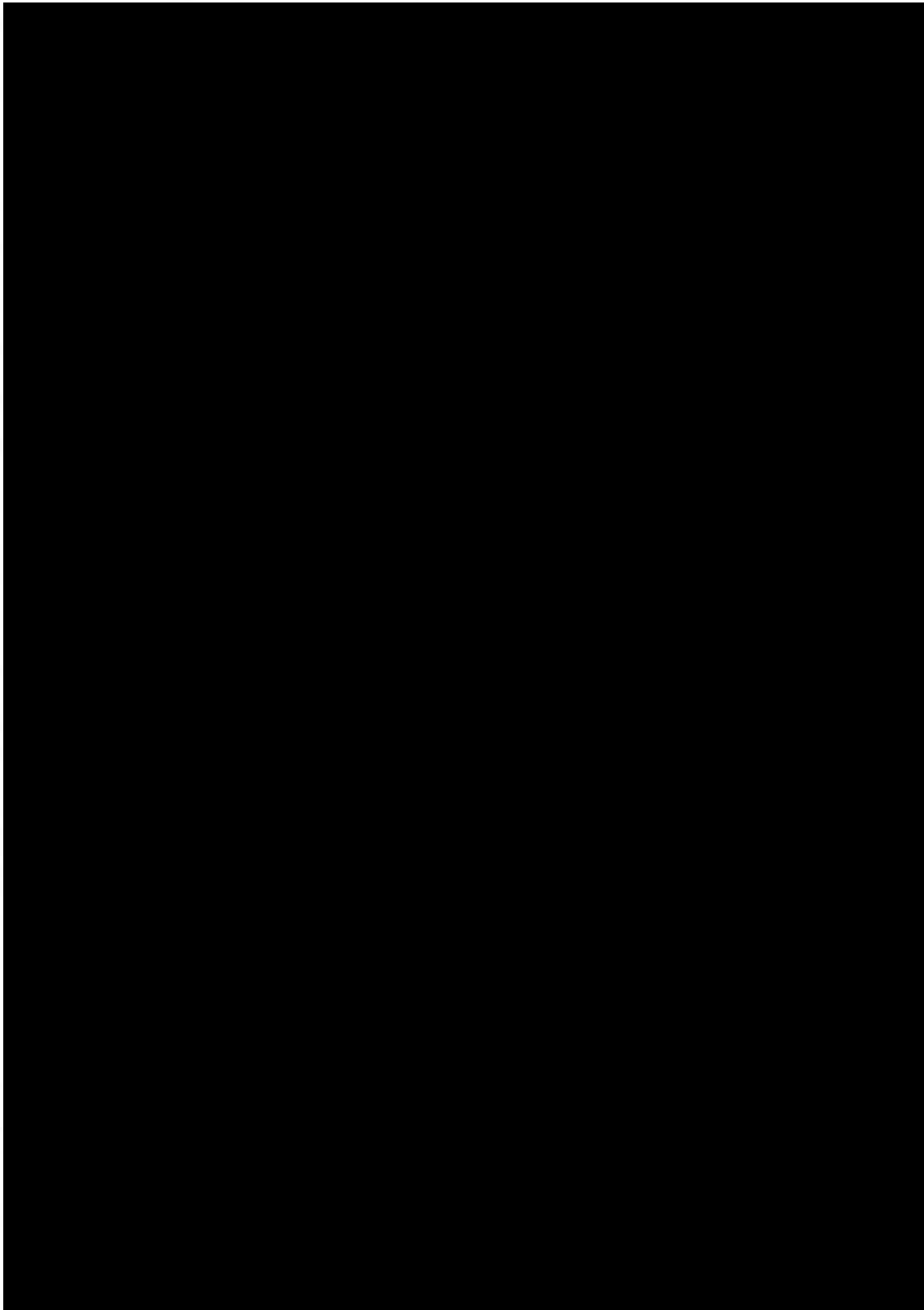
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